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7 *USAA General Indemnity Company*

8
9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA

11 EMILY ZERVAS,
12 Plaintiff,

13 vs.

14 USAA GENERAL INDEMNITY COMPANY,
15 a foreign corporation doing business in
Nevada, DOES I through X and ROE
16 CORPORATIONS XI through XX,

17 Defendants.

CASE NO. 2:18-cv-00051-JAD-GWF

STIPULATION AND ORDER TO EXTEND
DEADLINE FOR USAA'S RESPONSE TO
PLAINTIFF'S MOTION FOR LEAVE TO
FILE SECOND AMENDED COMPLAINT

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19 IT IS HEREBY STIPULATED AND AGREED, by and between Defendant USAA
20 General Indemnity Company ("USAA") and Plaintiff Emily Zervas ("Plaintiff"), by and
21 through their respective counsel of record that

22 - The due date for USAA's Response to *Plaintiff's Motion for Leave to File*
23 *Second Amended Complaint* (ECF No. 58) be extended from April 23, 2019 to May 17,
24 2019.

25 - This Request for an extension of time is not sought for any improper
26 purpose or other purpose of delay. This request for extension is based upon the
27 following:

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1 Counsel for Defendants initiated this request because they have numerous other
2 briefings due, including for scheduled mediations, and numerous depositions, as well as
3 scheduled time off during the month of April. Additionally, the Motion to File Second
4 Amended Complaint was filed concurrently with Plaintiff's Opposition to Defendant's
5 Motion to Dismiss. Together, these motions involve substantive issues of law which
6 require additional briefing and will necessarily impact both motions. As such, the parties
7 believe additional time to respond is warranted. This is the first request by USAA and
8 Plaintiff to extend this deadline, which is made in good faith and not for purposes of delay.

9 WHEREFORE, the parties respectfully request that this Court extend the time for
10 USAA to file its Response to *Plaintiff's Motion for Leave to File Second Amended*
11 *Complaint* (ECF No. 58) from April 23, 2019 to May 17, 2019.

12 DATED this 10th day of April, 2019

DATED this 10th day of April, 2019

13 SCHUETZE & McGAHA, P.C.

LEWIS BRISBOIS BISGAARD & SMITH LLP

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15 By: /s/ William W. McGaha
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22 ORDER

23 IT IS SO ORDERED.

24 Dated: April 11, 2019.

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26 
27 U.S. DISTRICT COURT JUDGE
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